

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RODNEY GRIFFIN,)	
)	
)	CIVIL ACTION
Plaintiff,)	
vs.)	
)	FILE NO. 24-cv-01463-TWT
RESTAURANT DEPOT LLC; XYZ)	
CORPS. 1-3 and JOHN DOES 1-3.)	
)	
)	
Defendants.)	

PLAINTIFF’S SUPPLEMENTAL INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and Local Rule 26.1, Plaintiff discloses and supplements the following based on currently available information. The numbered paragraphs below are styled in accordance with Appendix B to the Local Rules for the Northern District of Georgia. The supplemental information being provided is indicated following a recitation of the originally disclosed information. Plaintiff reserves the right to amend and supplement these disclosures as additional facts become known during the pendency of litigation and discovery.

(6) In the space provided below, provide a computation of any category of damages claimed by you. In addition, include a copy of, or describe by category and location of, the documents or other evidentiary material, not privileged or

protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered, making such documents or evidentiary material available for inspection and copying as under Fed.R.Civ.P. 34. (Attach any copies and descriptions to Initial Disclosures as Attachment D.)

Plaintiff is seeking the recovery of medical expenses, lost wages, incidental and consequential damages, and general damages for pain, suffering, and loss of enjoyment.

Plaintiff will supplement this Response as required by the Federal Rules of Civil Procedure.

SUPPLEMENTAL RESPONSE:

Plaintiff is seeking medical expenses in the amount of \$20,259.02, itemized as follows and supported by the medical billing records produced herewith:

- Emory John's Creek Hospital: \$1,312.00
- Resurgens Orthopedics: \$8,082.00
- Alliance Spine: \$10,362.02
- Comprehensive Neurology: \$503.00

Plaintiff is also seeking general damages, in an amount to be determined by the enlightened conscious of a jury. These are the damages being sought by Plaintiff in this case; Plaintiff is no longer claiming lost wages or incidental damages.

This 29th day of May, 2024.

Respectfully submitted,

By: /s/ Nathaniel K. Hofman
Madeleine N. Simmons
Georgia Bar No. 822807
Nathaniel K. Hofman
Georgia Bar No. 997966
Attorneys for Plaintiff

Stewart Miller Simmons Trial Attorneys
55 Ivan Allen Jr. Blvd.
Suite 700
Atlanta, Georgia 30308
(844) 874-2500 main
(470) 344-6719 fax
msimmons@smstrial.com
nhofman@smstrial.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing PLAINTIFF'S SUPPLEMENTAL INITIAL DISCLOSURES upon the following counsel of record by electronic mail at the following email address:

Lawrence Lee Washburn, IV, Esq.
Wilson Elser Moskowitz Edelman & Dicker, LLP
3348 Peachtree Rd
Suite 1400
Atlanta, GA 30326
Lee.washburn@wilsonelser.com

The undersigned, in accordance with L.R. 7.1 and 5.1 hereby certifies that the type font used herein is 14-Point Times New Roman font.

Respectfully submitted,

By: /s/ Nathaniel K. Hofman
Madeleine N. Simmons
Georgia Bar No. 822807
Nathaniel K. Hofman
Georgia Bar No. 997966
Attorneys for Plaintiff

Stewart Miller Simmons Trial Attorneys
55 Ivan Allen Jr. Blvd.
Suite 700
Atlanta, Georgia 30308
(844) 874-2500 main
(470) 344-6719 fax
msimmons@smstrial.com
nhofman@smstrial.com